

Mr. Glenn Davis
President
Hi-Tech Testing Service Incorporated
PO Box 12568
Longview, TX 75607

Dear Mr. Davis:

This responds to your letter of March 19, 1999, concerning the limitations on welders under 49 CFR 192.229. Our answers to your questions follow:

1. If a welder initially qualifies to API 1104 section 3.3 (Multiple Qualification), which requires him to make a butt and branch weld on pipe whose diameter is at least 6 5/8" and whose wall thickness is at least 1/4", and the welder is within the 6-month time limit for requalification, on what diameter and wall thickness of pipe must he test for requalification?

Answer: If a welder is qualified under section 3.3 of API 1104, ' 192.229(c)(1) requires that in each 6-month period one weld must be tested and found acceptable under Section 3 or Section 6 of API Standard 1104 to maintain the welder's qualification to weld on certain pipe. Section 192.229(c)(1) does not specify the diameter or wall thickness of pipe for this weld, just that the weld must satisfy the testing requirements of section 3 or 6 of API 1104. However, if a weld is not so tested and found acceptable within the 6-month period, then the welder must requalify under either section 3 of API 1104 or section IX of the ASME Boiler and Pressure Vessel Code using the pipe dimensions specified (' 192.227(a)).

2. If the same welder, qualified as above, has his one requalification weld nondestructively tested, is he limited to welding on line pipe only? Section 192.229(a) states that no welder whose qualification is based on nondestructive testing may weld compressor station pipe and components. Does this apply to initial qualification, requalification, or both?

Answer: Section 192.229(a) applies to initial qualification or requalification under ' 192.227. It does not apply to welds nondestructively tested each 6-month period under ' 192.229(c)(1) to maintain a welder's qualification. Also, it does not apply to welders qualified under section 3.3 of API 1104, which requires destructive testing of at least one of the qualification welds.

3. As the welder is making his one requalification weld, who is responsible for ensuring that the welder is welding in accordance with the welding procedure on which he initially qualified and monitoring of the test to insure the essential variables are not changed?

Answer: The operator of the pipeline on which the welder welds is responsible for compliance with the requirements governing qualification of welders (' 192.227) and limitations on welders (' 192.229).

4. Once a welder has successfully requalified by nondestructive testing, what documentation is required to be kept on file by the operator? Is a radiography report attesting to the soundness of the weld all that is needed or is a welder qualification report listing all these welding procedure specification variables required to be attached to the radiography report?

Answer: There is no documentation requirement for welds done under ' 192.229(c)(1).

I hope this information is helpful to you. Please let me know if we can offer any further assistance.

Sincerely,

Richard D. Huriaux
Manager, Regulations
Office of Pipeline Safety

LMFurrow:jmd:64046:5/10/99
cc: DPS-1,2,10,Regions,TSI,StateMailing